

OPEN MEETING ITEM 6/24/04



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COMMISSIONERS  
MARC SPITZER - Chairman  
WILLIAM A. MUNDELL  
JEFF HATCH-MILLER  
MIKE GLEASON  
KRISTIN K. MAYES

BRIAN C. McNEIL  
EXECUTIVE SECRETARY

ORIGINAL



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615

ARIZONA CORPORATION COMMISSION

MEMORANDUM

TO: Marc Spitzer, Chairman  
William A. Mundell  
Jeff Hatch-Miller  
Mike Gleason  
Kristin K. Mayes

Arizona Corporation Commission

DOCKETED

JUN 10 2004

FROM: Matthew J. Neubert  
Director of Securities

DOCKETED BY	
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AZ CORP COMMISSION  
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2004 JUN 10 P 2:10

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DATE: June 8, 2004

RE: *In the matter of Intersecurities, Inc., et al.* (S-03482A-03-0000); Proposed Order to Cease and Desist, Order of Restitution, Order for Administrative Penalties, Order of Revocation and Consent to Same by Gregory Russell Brown and Karen Brown, husband and wife

CC: Brian C. McNeil, Executive Secretary

Attached is a proposed Order to Cease and Desist, Order of Restitution, Order for Administrative Penalties, Order of Revocation and Consent to Same by Gregory Russell Brown ("Brown") and Karen Brown, husband and wife ("Respondents"), *In the matter of Intersecurities, Inc., et al.* The Order requires these Respondents to: 1) cease and desist from further violations of the Securities Act of Arizona; 2) pay restitution in the amount of \$230,000, equal to the full amount of remuneration they received in connection with this matter; 3) pay administrative penalties in the amount of \$7,500; and 4) revocation of Brown's securities salesman registration in Arizona.

This matter resulted from Brown's sale of pay telephone investment contracts offered by Alpha Telcom, Phoenix Telecom, and ETS Payphones and related entities. Brown sold these payphone contracts as "outside business activity" while employed as a registered securities salesman with a registered securities dealer, Intersecurities, Inc. ("ISI").

During the period when most of the contracts were sold, a number of jurisdictions had already begun to take actions against Alpha Telcom and ETS Payphones for illegal securities sales. As a result, a due diligence investigation of the issuers regarding the legality of the sales

could have determined that there were questions regarding whether the investments should have been registered as securities.

The proposed Consent Order calls for Respondent Gregory Brown to cease and desist from further violations of the Arizona Securities Act, and orders Respondents to disgorge all commissions Brown received from sales of the pay telephone investment contracts, in the amount of \$230,000, and pay an administrative penalty of \$7,500. The Securities Division recommends approval of this Consent Order. The Order reflects full disgorgement of all commissions, and the penalties are appropriate for the activity, considering the amount of commissions to be disgorged, the full cooperation of the Respondents, and their financial status.

Originated by: Pam Johnson

MJN/ptj

1 **BEFORE THE ARIZONA CORPORATION COMMISSION**

2 **COMMISSIONERS**

3 MARC SPITZER, Chairman  
4 WILLIAM A. MUNDELL  
5 JEFF HATCH-MILLER  
6 MIKE GLEASON  
KRISTIN K. MAYES

7 In the matter of )

DOCKET NO. S-03482A-03-0000

8 INTERSECURITIES, INC. )

DECISION NO. \_\_\_\_\_

9 570 Carillon Parkway )

St. Petersburg, FL 33716-1202 )

CRD# 16164 )

**ORDER TO CEASE AND DESIST,  
ORDER OF RESTITUTION, ORDER  
FOR ADMINISTRATIVE PENALTIES,  
ORDER OF REVOCATION AND  
CONSENT TO SAME BY:  
RESPONDENTS GREGORY RUSSELL  
BROWN and KAREN BROWN**

10 GREGORY RUSSELL BROWN and KAREN )

BROWN, husband and wife )

11 16417 South 15<sup>th</sup> Drive )

Phoenix, Arizona 85045 )

12 CRD# 2233684 )

13 Respondents. )

14  
15 RESPONDENT GREGORY RUSSELL BROWN ("BROWN") and RESPONDENT  
16 KAREN BROWN (collectively "RESPONDENTS") elect to permanently waive their right to a  
17 hearing and appeal under Articles 11 and 12 of the Securities Act of Arizona, A.R.S. § 44-1801, *et*  
18 *seq.* ("Securities Act") with respect to this Order To Cease And Desist, Order of Restitution, Order  
19 for Administrative Penalties, Order of Revocation and Consent to Same by: Respondents  
20 GREGORY RUSSELL BROWN and KAREN BROWN ("Order"). RESPONDENTS admit the  
21 jurisdiction of the Arizona Corporation Commission ("Commission"), including the Commission's  
22 jurisdiction over the marital community of BROWN and KAREN BROWN; neither admit nor  
23 deny the Findings of Fact and Conclusions of Law contained in this Order; and consent to the  
24 entry of this Order by the Commission.

25 **I.**

26 **FINDINGS OF FACT**

1. At all times material hereto, BROWN was a resident of Arizona. BROWN was

1 registered as a securities salesperson with INTERSECURITIES, INC., and was licensed in Arizona  
2 as an insurance salesperson.

3 2. At all times material hereto, BROWN and KAREN BROWN were husband and  
4 wife. BROWN's actions were in furtherance of and for the benefit of the marital community of  
5 BROWN and KAREN BROWN. KAREN BROWN was joined in this action pursuant to A.R.S.  
6 44-2031(C), solely to determine the liability of the marital community for BROWN's actions.

7 3. At all times material hereto, Alpha Telecom, Inc. ("Alpha") was an Oregon  
8 corporation located at 2751 Highland Avenue, Grants Pass, Oregon 97526.

9 4. At all times material hereto, American Telecommunications Company, Inc.  
10 ("ATC") was a Nevada corporation formed as a wholly owned subsidiary of Alpha on or about  
11 September 17, 1998. Originally named ATC, Inc., the name was changed to American  
12 Telecommunications Company, Inc., sometime in the first half of 2000. Its address was the same  
13 as Alpha's, but was later changed to 620 S.W. 4<sup>th</sup> Street, Grants Pass, Oregon 97526, then to 2900  
14 Vine Street, Suite J, Grants Pass, Oregon 97526, and then to 942 S.W. 6<sup>th</sup> Street, Suite G, Grants  
15 Pass, Oregon 97526.

16 5. At all times material hereto, Paul S. Rubera ("Rubera") was the president and  
17 control person of Alpha, and the control person of ATC.

18 6. ATC was organized by Rubera and operated in conjunction with and as an alter ego  
19 of Alpha. The two companies were controlled by Rubera and his associates.

20 7. At all times material hereto, Alpha and ATC and their affiliates, sold pay telephones  
21 with telephone service agreements pursuant to which the investor would share in the profits of the  
22 pay telephone. Investors would enter into two agreements, a purchase agreement, and a service  
23 agreement with Alpha to manage the phone. The two agreements were presented and promoted  
24 simultaneously. The telephones were presented to potential investors with four options in the way  
25 of service contracts, each varying in the amount of service provided. The four options varied from  
26 Level 1, which included a minimum of service, to Level 4, which provided full service to the

1 purchaser, including choosing a site and installing the telephone, collecting all revenue from the  
2 telephone's operation, repairing the telephone when necessary, and even repurchasing or buying  
3 back the telephone at the investor's option. Under Level 4, Alpha would split the net proceeds  
4 with the investor on a 70/30 basis, with Alpha retaining 70% and the investor receiving 30%. The  
5 price of the pay telephones was the same regardless of the service option chosen, \$5,000.00 per  
6 telephone. Although investors were given a choice of using a company other than Alpha to  
7 manage the phone, no Arizona investor to whom BROWN sold the investment picked a company  
8 other than Alpha to manage their phones. A "typical return" on each pay telephone was touted as  
9 14% per year. In practice, all purchasers received \$58.34 per month per pay telephone purchased,  
10 which amounted to exactly 14% per annum.

11 8. ATC's primary role was marketing the contracts. Alpha's main focus was on  
12 obtaining phone sites and installing, servicing, and managing the phones.

13 9. ATC was presented to the public as the sales organization for Alpha. In early 1999,  
14 ATC engaged Strategic Partnership Alliance, L.L.C., a Nevada limited liability company, and/or  
15 SPA Marketing, L.L.C., a Nevada limited liability corporation, (collectively "SPA") as its  
16 independent marketing and sales firm(s). SPA thereafter was responsible for hiring, training, and  
17 supervising sales agents who were selling the telephone contracts. After SPA came on board, ATC  
18 remained as the processing center for the contracts, while Alpha continued to perform the service  
19 and maintenance of the phones.

20 10. At all times material hereto, Phoenix Telecom, LLC ("Phoenix") was located in  
21 Georgia. Phoenix managed payphones sold to investors by TSI Group, Inc ("TSI") and Tri-Financial  
22 Group, Inc. ("Tri-Financial"), located in Michigan, pursuant to sales and lease-back agreements.

23 11. At all times material hereto, ETS Payphones, Inc. was a Georgia company. In or  
24 around late 1999 or early 2000, Phoenix transferred all of its lease agreements with investors to  
25 ETS. On September 11, 2000, ETS filed for bankruptcy protection under chapter 11 of the  
26 Bankruptcy Code, and investors stopped receiving their monthly payments.

1           12.     ETS managed payphones sold to investors by BEE Communications, Inc. ("BEE"),  
2     National Communications Marketing, Inc. ("NMCI"), and Communications Marketing, Associates  
3     ("CMA"), located in Georgia and Florida, pursuant to lease-back agreements.

4           13.     Under Phoenix and ETS lease-back agreements, investors would share in the profits  
5     generated by operation of their pay telephones. Investors would enter into two agreements, a  
6     purchase agreement, and a lease-back agreement with Phoenix or ETS to manage the phone. The  
7     two agreements were presented and promoted simultaneously. The telephones were presented to  
8     potential investors with three options in the way of service contracts, each varying in the amount of  
9     service provided. The three options varied from Option 1, which included a minimum of service,  
10    to Option 3, which provided full service to the purchaser, including choosing a site and installing  
11    the telephone, collecting all revenue from the telephone's operation, repairing the telephone when  
12    necessary, and even repurchasing or buying back the telephone at the investor's option. In the  
13    Phoenix and ETS investments, the price of each phone was \$7,000 under the full-service option;  
14    the distribution was \$82.25 per month for each phone. Although investors were given a choice of  
15    using a company other than ETS to manage the phone, no Arizona investor to whom BROWN sold  
16    the investment picked a company other than ETS to manage their phones. A "typical return" on  
17    each pay telephone was touted as 14% per year.

18           14.     BROWN, directly or indirectly, entered into agreements with Alpha, ATC, SPA,  
19    BEE, NMCI, CMA, Phoenix, and/or ETS, pursuant to which BROWN sold investment contracts  
20    involving Alpha pay telephones (the "Alpha investment contracts") and ETS pay telephones (the  
21    "ETS investment contracts") within or from the state of Arizona. All Alpha and ETS investment  
22    contracts BROWN sold were full service contracts.

23           15.     BROWN was paid commissions on each telephone sold.

24           16.     BROWN sold Alpha and ETS investment contracts involving at least 49 individuals or  
25    entities within or from the state of Arizona from May 2000 through April 2001, for a total sales  
26    amount of approximately \$2,752,850. However, those figures include more than \$400,000 paid by

1 BROWN and two other members of his family.

2 17. BROWN received commissions from the sale of Alpha and ETS investment contracts  
3 in the total amount of \$230,000.00.

4 18. Alpha and ETS have long regulatory histories in which state securities regulators have  
5 found that these purchases of pay telephones and accompanying service contracts were unregistered  
6 securities in the form of investment contracts that were sold by unregistered persons and/or entities,  
7 and ordered Alpha, ETS and those working with them to cease and desist. The orders entered during  
8 the period when BROWN was selling the Alpha and ETS investment contracts include:

- 9 a. September 25, 1998, Emergency Cease and Desist Order issued by Kansas  
10 Securities Commission against ETS, NCMI and others, for the sale of  
11 unregistered securities in Kansas. On September 21, 1999, the Kansas  
12 Securities Commission executed a Memorandum of Understanding, in which  
13 the Commission alleged, *inter alia*, that the sale of the phones and leases  
14 were securities in violation of the Kansas securities laws. NCMI agreed to  
15 discontinue the previous arrangements, and ETS agreed to refund the  
16 purchase price of the telephones to all Kansas customers. On February 8,  
17 2000, the Kansas Securities Commission dismissed the prior Emergency  
18 Cease and Desist Order.
- 19 b. February 2, 1999, Cease and Desist Order issued by Pennsylvania Securities  
20 Commission, *In the Matter of Alpha Telcom, Inc., et al.*, No. 9812-06.
- 21 c. November 17, 1999, Cease and Desist Order issued by North Carolina  
22 Secretary of State, *In the Matter of the North Carolina Securities Division v.*  
23 *ATC, Inc., Paul Rubera, et al.*, No. 99-038-CC.
- 24 d. June 30, 1999, Temporary Order of Prohibition issued by Illinois Secretary  
25 of State, *In the Matter of Alpha Telcom, Inc.*, No. 9900201.
- 26 e. January 14, 2000, Consent Order of Prohibition issued by Illinois Secretary  
of State, *In the Matter of Alpha Telcom, Inc.*, No. 9900201, in which Alpha  
agreed to offer rescission to all Illinois purchasers.
- f. November 24, 1999, Cease and Desist Order issued by Wisconsin  
Department of Financial Institutions, *In the Matter of Alpha Telcom, Inc.*  
*and Paul S. Rubera, et al.*, No. S-99225(EX).
- g. March 7, 2000, Temporary Cease and Desist Ordered issued by Rhode  
Island Department of Business Regulation, *In the Matter of Alpha Telcom,*  
*Inc. and ATC, Inc.*

1           h.     July 18, 2000, Florida Department of Banking and Finance filed  
2                 administrative action against Alpha and others, seeking a Cease and Desist  
3                 Order.

4           19.    On or about April 19, 1999, BROWN requested ISI to approve as "outside business  
5                 activity" his sale of payphone "business opportunities." BROWN sent ISI a package of materials to  
6                 review relating to payphone investments. Those materials included marketing and offering  
7                 documents relating to the ETS and Phoenix investment contracts.

8           20.    According to BROWN, on or about April 26, 1999, ISI informed BROWN that  
9                 Arizona was one of the states that uncovered fraudulent payphone operations and to check with the  
10                "Commissioner of Securities" to see if BCI/ETS Payphones had a clean record in Arizona.

11          21.    According to BROWN, on or about April 27, 1999, BROWN contacted the Arizona  
12                 Securities Division (the "Division") and inquired about ETS, BCI Financial, Phoenix, and Tri-  
13                 Financial and was informed that the Division had no record of any regulatory enforcement actions  
14                 taken against these companies in Arizona.

15          22.    On or about April 29, 1999, ISI approved BROWN'S sale of "ETS Payphones/BEE  
16                 Communications" as outside business activity.

17          23.    On or about November 25, 1999, ISI approved BROWN'S outside business activity  
18                 request to sell payphones sponsored by Phoenix.

19          24.    In or around April 2000, BROWN reported his activity involving the sale of Alpha  
20                 payphones to ISI in his Annual Compliance Review Questionnaire for Calendar Year 1999.

21          25.    On or about July 14, 2000, BROWN reported to ISI that the "phone deals"  
22                 comprised approximately 50% of his business, with year-to-date sales of \$200,000.

23          26.    On or about August 18, 2000, ISI instructed BROWN to stop selling any telephone  
24                 leasing or pay telephone "arrangements" for any company.

25          27.    Actions against Alpha and ETS after BROWN ceased his sales of the payphone  
26                 investment contracts include:



- a. On October 23, 2000, the California Department of Corporations issued Orders to Desist and Refrain from the sale of unregistered securities and securities fraud in California, against ETS, NCMI and others.
- b. October 24, 2000, Desist and Refrain Order issued by California Department of Corporations.
- c. On February 6, 2001, the Alabama Securities Division issued an Order to Cease and Desist from the sale of unregistered securities in Alabama, against ETS and others.
- d. On February 26, 2001, the Washington Securities Division issued a Summary Order to Cease and Desist from the sale of unregistered securities and securities fraud in Washington, against ETS, NMCI.
- e. On February 28, 2001, the Indiana Securities Division Office of the Secretary of State issued an Order to Cease and Desist from the sale of unregistered securities and securities fraud in Indiana, against ETS, NCMI.
- f. On March 5, 2001, the Indiana Securities Division Office of the Secretary of State issued an Order to Cease and Desist from the sale of unregistered securities and securities fraud in Indiana, against Phoenix, Tri-Financial and others.
- g. July 26, 2001, Cease and Desist Order issued by Ohio Commissioner of Securities;
- h. August 27, 2001, Temporary Restraining Order issued by United States District Court, District of Oregon, *SEC v. Alpha Telcom, Inc., et al.*, No. CV 01-1283 PA
- i. September 5, 2001, Cease and Desist Order issued by Arkansas Securities Department, *In the Matter of Alpha Telcom, Inc., et al.*, No. 01-36-S.
- j. September 6, 2001, Preliminary Injunction issued by United States District Court, District of Oregon, *SEC v. Alpha Telcom, Inc., et al.*, No. CV 01-1283 PA.
- k. February 7, 2002, Final Judgment of Permanent Injunction issued by United States District Court, District of Oregon, *SEC v. Alpha Telcom, Inc., et al.*, No. CV 01-1283 PA.
- l. March 13, 2002, Final Order to Cease and Desist issued by Washington Department of Financial Institutions, *In the Matter of Alpha Telcom, Inc., et al.*, No. SDO-21-02.

The SEC's Complaint in the United States District Court, District of Oregon, alleged that Alpha and its affiliates engaged in a Ponzi-like scheme that never generated enough income to pay expenses, and that the money paid to existing investors always came from sales to new investors. Several days before the Temporary Restraining Order was issued on August 27, 2001, Alpha

1 sought bankruptcy protection in Florida pursuant to chapter 11 of the Bankruptcy Code. A court-  
2 appointed receiver subsequently took over the remaining operations of Alpha. Alpha consented  
3 on October 19, 2001 to entry of the Final Judgment of Permanent Injunction against it, but did  
4 not admit the allegations of the Complaint.

5 28. On February 7, 2002, the United States District Court for the District of Oregon  
6 issued its final opinion in connection with the trial of Paul Rubera. That opinion is reported at  
7 *SEC v. Alpha Telcom*, 187 F. Supp. 2d 1250 (D. Or. 2002). In its opinion, the court confirmed  
8 that the Alpha investment contracts are securities and thus subject to regulation as securities. The  
9 court also confirmed that Alpha operated what was essentially a Ponzi scheme in connection with  
10 the sale of the Alpha investment contracts.

11 29. Monthly payments to investors ceased prior to August, 2001.

## 12 II.

### 13 CONCLUSIONS OF LAW

14 1. The Commission has jurisdiction over this matter pursuant to Article XV of the  
15 Arizona Constitution and the Securities Act.

16 2. The Commission has jurisdiction to enter an order that may be collected from  
17 property attributable to the marital community of RESPONDENTS, pursuant to A.R.S.  
18 § 44-2031(C).

19 3. BROWN offered or sold securities within or from Arizona, within the meaning of  
20 A.R.S. §§ 44-1801(15), 44-1801(21), and 44-1801(26).

21 4. BROWN violated A.R.S. § 44-1841 by offering or selling securities that were  
22 neither registered nor exempt from registration.

23 5. BROWN'S conduct is grounds for a cease and desist order pursuant to A.R.S.  
24 § 44-2032.

25 6. BROWN'S conduct is grounds for an order of restitution pursuant to A.R.S.  
26 § 44-2032.



1 the amount of \$7,500.00, payable to the "State of Arizona." Payment shall be made by cashier's  
2 check or money order, with the initial payment of \$1,000.00 due and payable on the date of this  
3 Order. The remaining penalty amount shall be subordinate to the restitution obligations in the  
4 preceding paragraph, and shall be paid following payment in full of that restitution obligation and  
5 pursuant to the payment schedule set forth in the preceding paragraph. If RESPONDENTS do not  
6 comply with this order for administrative penalties, any outstanding balance shall be deemed in  
7 default and shall be immediately due and payable.

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1 IT IS FURTHER ORDERED, pursuant to A.R.S. § 44-1962, that BROWN'S securities  
2 salesman registration is revoked.

3 IT IS FURTHER ORDERED that this Order shall become effective immediately.

4 BY ORDER OF THE ARIZONA CORPORATION COMMISSION

5  
6  
7  
8 CHAIRMAN

COMMISSIONER

COMMISSIONER

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12 COMMISSIONER

COMMISSIONER

13 IN WITNESS WHEREOF, I, BRIAN C. McNEIL,  
14 Executive Secretary of the Arizona Corporation  
15 Commission, have hereunto set my hand and caused the  
16 official seal of the Commission to be affixed at the  
17 Capitol, in the City of Phoenix, this \_\_\_\_\_ day of  
18 \_\_\_\_\_, 2004.

19 \_\_\_\_\_  
20 BRIAN C. McNEIL  
21 Executive Secretary

22 \_\_\_\_\_  
23 DISSENT

24 This document is available in alternative formats by contacting Yvonne McFarlin, Executive  
25 Assistant to the Executive Secretary, voice phone number 602-542-3931, E-mail  
26 [ymcfarlin@cc.state.az.us](mailto:ymcfarlin@cc.state.az.us).

PTJ

**CONSENT TO ENTRY OF ORDER**

1  
2 1. RESPONDENTS GREGORY RUSSEL BROWN ("BROWN"), an individual, and  
3 KAREN BROWN, his wife ("RESPONDENTS") admit the jurisdiction of the Commission over  
4 the subject matter of this proceeding. RESPONDENTS acknowledge that they have been fully  
5 advised of their right to a hearing to present evidence and call witnesses and RESPONDENTS  
6 knowingly and voluntarily waive any and all rights to a hearing before the Commission and all  
7 other rights otherwise available under Article 11 of the Securities Act and Title 14 of the Arizona  
8 Administrative Code. RESPONDENTS acknowledge that this Order To Cease And Desist, Order  
9 of Restitution, Order for Administrative Penalties, Order of Revocation and Consent to Same by:  
10 Respondents Gregory Russell Brown and Karen Brown ("Order") constitutes a valid final order of  
11 the Commission.

12 2. RESPONDENTS knowingly and voluntarily waive any right they may have under  
13 Article 12 of the Securities Act to judicial review by any court by way of suit, appeal, or  
14 extraordinary relief resulting from the entry of this Order.

15 3. RESPONDENTS acknowledge and agree that this Order is entered into freely and  
16 voluntarily and that no promise was made or coercion used to induce such entry.

17 4. RESPONDENTS acknowledge that they have been represented by counsel in this  
18 matter, they have reviewed this Order with their attorney and understand all terms it contains.

19 5. RESPONDENTS neither admit nor deny the Findings of Fact and Conclusions of Law  
20 contained in this Order.

21 6. By consenting to the entry of this Order, RESPONDENTS agree not to take any action  
22 or to make, or permit to be made, any public statement denying, directly or indirectly, any Finding  
23 of Fact or Conclusion of Law in this Order or creating the impression that this Order is without  
24 factual basis. RESPONDENTS will undertake steps necessary to assure that all of their agents and  
25 employees, if any, understand and comply with this agreement. Nothing in this Order, however,  
26 shall in any way limit RESPONDENTS' ability to defend themselves and/or take any contrary

1 position of fact or law in any subsequent litigation or other proceeding in which the Commission is  
2 not a party.

3 7. While this Order settles this administrative matter between RESPONDENTS and the  
4 Commission, RESPONDENTS understand that this Order does not preclude the Commission from  
5 instituting other administrative proceedings based on violations that are not addressed by this  
6 Order.

7 8. RESPONDENTS understand that this Order does not preclude the Commission from  
8 referring this matter to any governmental agency for administrative, civil, or criminal proceedings  
9 that may be related to the matters addressed by this Order.

10 9. RESPONDENTS understand that this Order does not preclude any other agency or  
11 officer of the state of Arizona or its subdivisions from instituting administrative, civil or criminal  
12 proceedings that may be related to matters addressed by this Order.

13 10. RESPONDENTS agree that they will not exercise any control over any entity that  
14 offers or sells securities or provides investment advisory services, within or from Arizona.

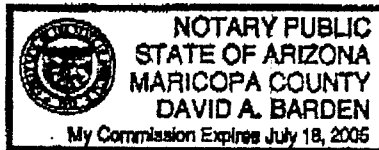
15 11. RESPONDENTS agree that until restitution and penalties are paid in full,  
16 RESPONDENTS will notify the Director of the Securities Division within 30 days of any change  
17 in home address or any change in RESPONDENTS' ability to pay amounts due under this Order.

18 12. RESPONDENTS understand that default shall render them liable to the Commission  
19 for its costs of collection and interest at the maximum legal rate.

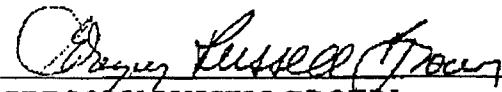
20 13. RESPONDENTS agree that they will continue to cooperate with the Securities  
21 Division, including but not limited to providing complete and accurate testimony at any hearing in  
22 this matter and cooperating with the state of Arizona in any related investigation or any other  
23 matters arising from the activities described in this Order.

24 14. RESPONDENTS acknowledge that any restitution, rescission or penalties imposed by  
25 this Order are obligations of BROWN as well as the marital community of RESPONDENTS.  
26


1 15. RESPONDENTS consent to the entry of this Order and agrees to be fully bound by its  
2 terms and conditions. If RESPONDENTS breach any provision of this Order, the Commission  
3 may vacate this Order and restore this case to its active docket.



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GREGORY RUSSELL BROWN

SUBSCRIBED AND SWORN TO BEFORE me this 8 day of June, 2004.

  
NOTARY PUBLIC

My Commission Expires: 7-19-05

KAREN BROWN

SUBSCRIBED AND SWORN TO BEFORE me this \_\_\_\_\_ day of June, 2004.

NOTARY PUBLIC

My Commission Expires:

NAENFORCE\CASES\SI.P\PLEADING\Final Consent Brown.doc



Docket No. S-03507A-02-0000

1 15. RESPONDENTS consent to the entry of this Order and agrees to be fully bound by its  
2 terms and conditions. If RESPONDENTS breach any provision of this Order, the Commission  
3 may vacate this Order and restore this case to its active docket.  
4  
5

6 \_\_\_\_\_  
7 GREGORY RUSSELL BROWN

8 SUBSCRIBED AND SWORN TO BEFORE me this \_\_\_\_\_ day of June, 2004.  
9

10 \_\_\_\_\_  
11 NOTARY PUBLIC

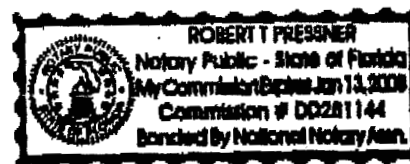
12 My Commission Expires:  
13  
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15 \_\_\_\_\_  
16 KAREN BROWN

17 SUBSCRIBED AND SWORN TO BEFORE me this 9 day of June, 2004.  
18

19 \_\_\_\_\_  
20 NOTARY PUBLIC

21 My Commission Expires:  
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26

14

Decision No. \_\_\_\_\_

66255-2-35

2003-06-27 ACC